

1 Teresa M. Corbin (SBN 132360)
2 Denise M. De Mory (SBN 168076)
3 Jaclyn C. Fink (SBN 217913)
4 HOWREY LLP
5 525 Market Street, Suite 3600
6 San Francisco, California 94105
7 Telephone: (415) 848-4900
8 Facsimile: (415) 848-4999

9 Attorneys for Plaintiff SYNOPSYS, INC.
10 and for Defendants AEROFLEX INCORPORATED,
11 AMI SEMICONDUCTOR, INC., MATROX
12 ELECTRONIC SYSTEMS, LTD., MATROX
13 GRAPHICS, INC., MATROX INTERNATIONAL
14 CORP., MATROX TECH, INC. and AEROFLEX
15 COLORADO SPRINGS, INC.

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 RICOH COMPANY, LTD.,

20 Plaintiff,

21 vs.

22 AEROFLEX INCORPORATED, et al.,

23 Defendants.

Case No. C03-04669 MJJ (EMC)

Case No. C03-2289 MJJ (EMC)

**DECLARATION OF DENISE M. DE MORY
IN SUPPORT OF ADMINISTRATIVE
MOTION FOR PLACING DOCUMENTS
UNDER SEAL (L.R. 7-11 and 79-5(d))**

Judge: Hon. Martin J. Jenkins

24 SYNOPSYS, INC.,

25 Plaintiff,

26 vs.

27 RICOH COMPANY, LTD.,

28 Defendant.

Case No. C03-4669 MJJ (EMC)
DECLARATION OF DENISE M. DE MORY
ISO ADMINISTRATIVE MOTION FOR PLACING
DOCUMENTS UNDER SEAL

1 I, DENISE M. DE MORY, declare as follows:

2 1. I am a partner in the law firm of Howrey LLP, counsel of record for Plaintiff Synopsys,
3 Inc. and Defendants Aeroflex Incorporated, Aeroflex Colorado Springs, Inc., AMI Semiconductor,
4 Inc., Matrox Electronic Systems, Ltd., Matrox Graphics, Inc., Matrox International Corp., and Matrox
5 Tech, Inc. ("the Customer Defendants"). I have personal knowledge of the facts set forth in this
6 Declaration and, if called upon to do so, I could and would testify competently to the matters set forth
7 herein.

8 2. Synopsys and the Customer Defendants have lodged the following documents with the
9 clerk pursuant to Civil Local Rule 79-5:

10 a. Reply Memorandum in Support of Synopsys, Inc.'s and Customer Defendants'
11 Motion for Summary Judgment of Non-Infringement (RTL) (No. 1).

12 b. Reply Memorandum in Support of Synopsys, Inc.'s and Customer Defendants'
13 Motion for Summary Judgment of Non-Infringement (Hardware Cells) (No. 2).

14 c. Reply Memorandum in Support of Synopsys, Inc.'s and Customer Defendants'
15 Motion for Summary Judgment of Non-Infringement (Other Elements) (No. 6).

16 d. Reply Memorandum In Support of Defendants' Motion for Summary Judgment
17 Regarding the Scope of Patent Damages for Alleged Infringement of U.S. Patent No. 4,922,432 (No.
18 7).

19 e. Exhibit No. 106 ("Exhibit") of the Supplemental Declaration of Denise M. De
20 Mory In Support of Motions For Summary Judgment.

21 3. The Exhibit was generated by Synopsys or the Customer Defendants and was
22 designated confidential pursuant to the protective order entered in this case.

23 4. The Motion and Exhibit contains nonpublic business information of Synopsys, the
24 Customer Defendants, or third parties. This information is not publicly known and could cause
25 Synopsys, the Customer Defendants, or third parties competitive harm were it to become publicly
26 known.

5. Synopsys and the Customer Defendants believe that the Motion and Exhibit are properly designated under the protective order entered in this case, and respectfully requests that the Court order the Motion and Exhibit to be filed under seal.

I declare under penalty of perjury under the laws of the State of that the foregoing is true and correct.

This declaration was executed at San Francisco, California on September 11, 2006.

/s/ Denise M. De Mory